

Exhibit B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,)	
)	
Plaintiff/Counter-Defendant)	Civil Action No. 3:22-cv-00208-CWR-RPM
)	
v.)	
)	URGENT AND NECESSITOUS
HONORSOCIETY.ORG, INC.,)	
)	ORAL ARGUMENT REQUESTED
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
HONOR SOCIETY FOUNDATION, INC.,)	
)	
Defendant)	
)	
-----)	
)	
HONORSOCIETY.ORG, INC.,)	
)	
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
v.)	
)	
DR. LYNN TINCHER-LADNER,)	
)	
Third-Party Defendant)	

Declaration of Dr. Lynn Tinchler-Ladner

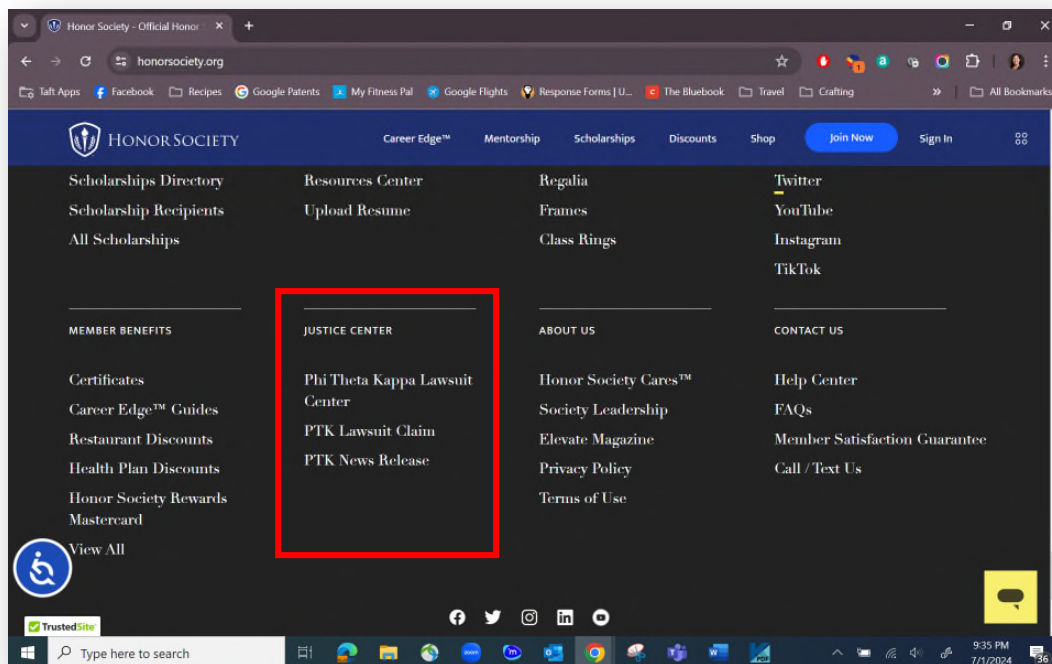
I, Lynn Tinchler-Ladner, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the President and CEO of Phi Theta Kappa Honor Society (“PTK”).
2. In April 2022, PTK initiated this lawsuit against Honor Society.org, Inc. (“Honor Society”). Since then, I understand that many pleadings have been exchanged and the parties have

cooperated to engage in substantial discovery pursuant to the relevant Federal and Local Rules and as contemplated by the Court's Protective Order.

3. In the last several weeks, Defendants have published or contributed to more than 5000 articles containing information that is false, misleading or deceptive about PTK, created an active Twitter (@PTKLawsuit) account dedicated to falsely reframing this lawsuit (e.g., #PTKLawsuit) as one initiated by Honor Society, and launched a website replete with content disparaging PTK and lawsuit-related commentary.

4. These publications are widespread and near-continuous. Defendants' postings direct their combined near 30,000 followers across Twitter and LinkedIn back to Defendants' websites where they present their own misleading publications. In addition, Honor Society boasts on its website that it is the largest honor society by web traffic, implying a high volume of traffic to its website, including to those pages about PTK, which are linked directly from Honor Society's homepage under a tab titled "JUSTICE CENTER":



5. Although I initially learned of a few of these publications, namely Defendants' press release, on or about May 14, 2024, which I did find concerning, it was only Defendants' most recent publications beginning in mid-June 2024 that I found truly harmful and threatening not only to PTK but also to myself.

6. On or about June 19, it appears that Defendants used Artificial Intelligence (AI) to create approximately 5,000 new webpages, associated with nearly all PTK's partner colleges, so that when college students and parents search for information on PTK during enrollment season, they will be directed to Defendants' misleading, fantastical articles. This belief is based on the duplicative content across the pages that only substantively differs in the name of each college referenced. For example, the following table reflects just a fraction of the overlap between the articles made to look unique to each college:

Sheridan College	Northeast Wisconsin Technical College	Southwest Technical College
<p><i>Inclusion, Belonging, and Access at Sheridan College, Main Campus</i></p> <p>In today's evolving academic societies, the principles of inclusion, belonging, and access hold paramount importance. Sheridan College, Main Campus exemplifies a commitment to fostering an environment where every student can thrive, regardless of their background. Inclusion ensures that diverse perspectives are valued, belonging fosters a sense of community, and access guarantees that opportunities are available to all students.</p>	<p><i>The Importance of Inclusion, Belonging, and Access at Northeast Wisconsin Technical College, Green Bay Campus</i></p> <p>In today's academic societies, fostering a sense of inclusion, belonging, and providing access to all students is of paramount importance. Northeast Wisconsin Technical College (NWTC), Green Bay Campus, recognizes this need and offers a multitude of honors programs and honor societies that cater to diverse student interests and academic achievements.</p>	<p><i>The Importance of Inclusion, Belonging, and Access in Academic Societies at Southwest Technical College, Fennimore Campus</i></p> <p>In today's academic societies, inclusion, belonging, and access are fundamental elements that contribute to a thriving educational environment. At Southwest Technical College, Fennimore Campus, these principles are upheld through a variety of honors programs and societies that cater to diverse student needs and aspirations.</p>

Sheridan College	Northeast Wisconsin Technical College	Southwest Technical College
<p><i>Honors Programs and Societies at Sheridan College</i></p> <p>Sheridan College, Main Campus offers a multitude of honors programs and societies designed to recognize and nurture academic excellence. Students have a variety of options to choose from, each providing unique benefits and fostering a supportive academic environment. These programs not only celebrate academic achievements but also prepare students for future educational and career opportunities.</p>	<p><i>Honors Programs and Societies at NWTC</i></p> <p>At NWTC, students have the opportunity to join various honors programs and societies that celebrate their academic success and provide platforms for further growth. While Phi Theta Kappa (PTK) is a well-known honor society, it is important to note that NWTC hosts several other distinguished societies, ensuring that students have multiple avenues to explore and benefit from.</p>	<p><i>Honors Programs and Societies at Southwest Technical College, Fennimore Campus</i></p> <p>Southwest Technical College, Fennimore Campus, offers a multitude of honors programs and societies for students to choose from. These programs are designed to recognize academic excellence, foster a sense of community, and provide access to valuable resources and opportunities. Some of the notable honors programs include the National Society of Leadership and Success (NSLS), Lambda Epsilon Chi (LEX) for paralegal students, and the National Technical Honor Society (NTHS).</p>
<p><i>Potential Liability for Schools Hosting PTK Chapters</i></p> <p>For institutions like Sheridan College, Main Campus, hosting a PTK chapter could potentially expose them to liability due to the known false advertising issues. Schools have a responsibility to protect their students from deceptive advertising practices and to ensure that honor societies operating on campus adhere to ethical standards.</p>	<p><i>Impact on Individual Chapters</i></p> <p>These allegations raise significant concerns about the integrity of PTK and the potential liability for schools hosting PTK chapters. It is crucial for educational institutions like NWTC to protect their students from deceptive advertising practices. Misleading letters of recommendation and false claims about academic standing can negatively affect students' future education and career opportunities.</p>	<p><i>Protecting Students from Deceptive Advertising Practices</i></p> <p>It is crucial for academic institutions, including Southwest Technical College, Fennimore Campus, to protect their students from deceptive advertising practices. Schools must ensure that the honors programs and societies they endorse maintain high ethical standards and provide accurate information to their members.</p>

Given that PTK has a chapter at nearly every community college in the U.S., the identical nature of the articles, and their mass creation/upload dates, I believe that these articles were generated with the assistance of AI.

7. Defendants' publications also wrongfully associate their Counterclaims with their own prior allegations of sexual harassment and embezzlement against PTK. They also caricature me and photoshop me into images with the ex-director of PTK to falsely imply a close association between myself and the ex-director.

8. Honor Society claims to be the largest honor society "by web traffic" and it now appears to be using its "high-traffic" websites and expertise in social media to maximize the reach of its tortious interference and jury manipulation.

9. Community college students and their parents heavily rely on the Internet to provide them information about on campus organizations, including PTK, which is typically featured on each college partner's website. In searching PTK, it would not be atypical for a student or a parent to – and in fact most likely do – Google "Phi Theta Kappa and [insert community college name]." Before, the college would be the first result followed by PTK's subpage dedicated to its chapters, but now it appears that Honor Society's own articles appear above those of PTK, driving more traffic to Defendants' webpages and exacerbating the distribution of Defendants' misinformation campaign.

10. PTK has already seen injury as a result of Defendants' conduct which will continue unless Defendants are enjoined.

Statements on Defendants' Websites

11. Defendants have created a new website titled "**PTKLawsuit.com**" where they "urge[] those affected by PTK's deceptive practices to come forward." The site states, "[i]f you

have insights or information about PTK’s alleged deceptive practices, please email **PTKLawsuit@gmail.com.**” *Id.* (emphasis added). Even the title of the website is misleading: “False Advertising & Attempted Monopoly -The Phi Theta Kappa Lawsuit Details.” The title makes it appear that Honor Society brought this suit against PTK; however, Honor Society is not a crusader. PTK initiated the lawsuit over two years ago, alleging, among other things, false advertising. Honor Society filed Counterclaims, which only recently included an attempted monopolization claim. Further, the title of the article does nothing to qualify that “False Advertising & Attempted Monopoly” are *allegations* that Honor Society has made. Instead, the headline reads as something like fact rather than something alleged.

12. On the Honor Society website, Defendants have created a “JUSTICE CENTER” based solely on what they call the “Phi Theta Kappa Lawsuit.” They say:

Phi Theta Kappa Lawsuit

Welcome to the FAQ section dedicated to the Phi Theta Kappa (PTK) lawsuit. Here, you will find answers to common questions regarding the legal actions taken against PTK. Our goal is to provide clear and concise information about the allegations, legal proceedings, and implications for current and prospective members of honor societies. This FAQ section is designed to help you understand the key issues surrounding the lawsuit, including accusations of false advertising, misleading claims about membership exclusivity, and anticompetitive behavior. We aim to ensure transparency and provide valuable insights into the ongoing legal matters affecting PTK and its leadership. Stay informed, stay connected, and know your rights as a member of an honor society. This page is not affiliated with Phi Theta Kappa.

Defendants claim their website “provides crucial information about the potential implications and necessary actions for students involved with PTK” and provides “essential reading for anyone affiliated with or considering joining PTK, ensuring you are well-informed about your rights and the organization’s current challenges.”

HonorSociety.org Support › Phi Theta Kappa Lawsuit › Impact on Community College Students, Faculty and Staff

Impact on Community College Students, Faculty and Staff

Welcome to the Impact on Community College Members section of our Phi Theta Kappa Lawsuit FAQ. This section is dedicated to explaining how the ongoing legal battle against Phi Theta Kappa affects current and prospective members. It provides crucial information about the potential implications and necessary actions for students involved with PTK. Key Topics Covered: How does the lawsuit affect current Phi Theta Kappa members? Learn about the immediate and long-term impacts on existing members. What should prospective members know about the lawsuit? Understand the key considerations for students thinking about joining PTK. Are there any immediate actions members need to take? Get guidance on any steps current and prospective members should consider in light of the lawsuit. This section aims to offer clear insights into how the allegations and legal proceedings may influence your experience with Phi Theta Kappa. It's essential reading for anyone affiliated with or considering joining PTK, ensuring you are well-informed about your rights and the organization's current challenges. Stay informed and proactive about the developments affecting the Phi Theta Kappa community. For additional support or specific inquiries, feel free to contact our team. This is not affiliated with Phi Theta Kappa.

In reality, this is a collection of numerous publications misrepresenting the nature of the lawsuit and overtly attacking PTK and my reputations.

13. The statements on the website include the following:

- PTK's "misleading endorsements deceived colleges and employers about the true academic standing of PTK members, undermining trust in the society's credibility."
- My "leadership is scrutinized for promoting false advertising about membership and scholarships and for engaging in tactics intended to maintain PTK's dominance in the market."
- PTK is "accused of engaging in anticompetitive behaviors designed to monopolize the community college honor society market. This includes using their dominant position to discredit and exclude competitors, urging colleges to block communications from other honor societies, and leveraging their influence to maintain a near-monopoly status, ultimately harming students by limiting their options."
- "[T]he criteria used by PTK often allow a much larger percentage of students to qualify, misleading students about the true exclusivity of their membership."

- “The lawsuit accuses PTK of falsely advertising their members are in the “top 10%” of their class, exaggerating exclusive access to scholarships, and attempting to monopolize the community college honor society market.”
- “PTK might face a loss of trust and credibility among students, educational institutions, and the broader community. Restoring its reputation would require substantial efforts to improve transparency, accountability, and the accuracy of its claims. This could lead to systemic changes within the organization to rebuild trust.”
- “Educational institutions that may knowingly or unknowingly endorse or support PTK might need to reconsider their relationships with the society if the allegations are proven. Institutions should evaluate the claims and their own practices to ensure they are not inadvertently endorsing misleading information. This might involve reviewing their own promotional materials and communications about PTK to ensure they are accurate and transparent.”
- “If the claims of deceptive advertising, false exclusivity, and misleading scholarship information are proven true, students may need to reassess the value and benefits of PTK membership. It’s crucial for students to stay informed about the lawsuit’s progress and its potential outcomes to make educated decisions about joining or remaining in the society.”
- “You can support the lawsuit against Phi Theta Kappa by staying informed and spreading awareness about the issues. Share information on social media, talk to fellow students . . .”
- “The acceptance rate for Phi Theta Kappa (PTK) honor society is much higher than advertised, with 40% of the school invited, making it easier and less exclusive than they portray. . . [t]his discrepancy between the claim and reality can mislead students about the exclusivity and prestige of PTK.”
- “While Phi Theta Kappa (PTK) claims it is an honor society, it’s important to scrutinize the claims and reality behind its operations.” For example, “PTK [is] less exclusive than it claims” and PTK’s “promotional materials often exaggerate the exclusivity and benefits of membership . . . but the actual requirements are relatively easy to meet . . . diminish[ing] the true value and respect associated with PTK membership.”
- “PTK frequently overstates the average scholarship amounts received by its members, creating a false impression of financial advantages.”
- “Once accepted, PTK does not rigorously enforce academic standards for maintaining membership. This lack of ongoing oversight means that the commitment to academic excellence PTK claims to uphold is not strictly monitored, further diminishing its credibility as an honor society.”

- “The perceived value of PTK membership can vary significantly . . . the less stringent criteria and misleading claims can make it seem less valuable.”
- “Yes, you can put Phi Theta Kappa (PTK) on a resume, but you should think twice about it.” and “[W]hile you can list Phi Theta Kappa on your resume, it’s important to weigh the actual benefits and the potential for employers to see through the inflated claims of exclusivity and scholarship benefits. Think carefully about whether PTK truly reflects your accomplishments and consider whether other aspects of your academic and extracurricular experiences might be more impactful.”
- “Prospective members should carefully consider these factors when deciding whether to join.” (*Id.* at 98) While “PTK presents itself as a respected honor society, the reality is that it is not as exclusive or prestigious as it claims. The deceptive advertising regarding its membership criteria and scholarship opportunities, along with the lack of rigorous ongoing standards, contribute to a diminished respect for the organization. If you are considering joining or listing PTK on your resume, it’s important to critically evaluate what it truly represents and whether it aligns with your personal and professional goals.”
- “PTK has engaged in behaviors intended to stifle competition, calling into question its commitment to fair and ethical practices. . . . These issues make Phi Theta Kappa less impressive to employers who value honesty, integrity, and transparency. For students seeking to enhance their resumes, it’s advisable to seek out honor society and organizations with clear ethical standards.”
- PTK’s “actions highlight a pattern of unethical behavior and deception that calls into question the legitimacy of PTK as an honor society. For students seeking genuine recognition and opportunities, it’s crucial to be aware of these issues and consider alternatives that uphold higher ethical standards and transparency.”

1. **Misleading "Top 10%" Claims:** The lawsuit claims PTK falsely asserts that students invited to join are in the "Top 10%" of their class. In reality, PTK's criteria allow a much larger percentage of students to qualify, misleading them about the exclusivity of the honor society. For example, at Oakton Community College, 44% of students meet PTK's GPA standard, far exceeding the top 10%.
2. **Questionable Letters of Recommendation:** PTK is accused of issuing letters of recommendation signed by CEO [Lynn Tincher-Ladner](#), claiming the member is in the top 10% at their school without any factual basis. This practice allegedly deceives students, colleges, and employers about the merit of PTK membership.
3. **Dubious Scholarship Promotions:** The lawsuit alleges PTK promotes access to \$246 million in exclusive scholarships, which are actually broadly available transfer scholarships. This misrepresentation allegedly leads students to pay for PTK membership under false pretenses. PTK also claims its "average member gets \$2,500 a year" in scholarships, which is disputed in the lawsuit.
4. **Anticompetitive Tactics:** The lawsuit highlights PTK's alleged attempts to monopolize the community college honor society market through aggressive and deceptive practices. This includes falsely claiming to be the "only official" honor society and selling members' personal information without their consent.

14. Defendants have also posted an FAQ Section on the Honor Society website, which misrepresents the nature of the lawsuit and overtly attacks PTK's reputation:

What are the potential long-term effects of the lawsuit on PTK's reputation?

The long-term effects of the lawsuit on PTK's reputation could be significant, especially if the allegations are substantiated. PTK might face a loss of trust and credibility among students, educational institutions, and the broader community. Restoring its reputation would require substantial efforts to improve transparency, accountability, and the accuracy of its claims. This could lead to systemic changes within the organization to rebuild trust.

What is the acceptance rate for Phi Theta Kappa honor society?

Top 10% Claims: PTK advertises that it only accepts the top 10% of students. However, school records often show that the admission standards are much broader, including a significant portion of the student body, sometimes up to 60%. This discrepancy between the claim and the reality can mislead students about the exclusivity and prestige of PTK.

Do Employers Care About Phi Theta Kappa?

No, employers generally do not care about Phi Theta Kappa in general, and further due to its alleged questionable practices and misleading claims.

These issues make Phi Theta Kappa less impressive to employers who value honesty, integrity, and transparency. For students seeking to enhance their resumes, it's advisable to seek out honor societies and organizations with clear ethical standards.

Is Phi Theta Kappa a legitimate honor society?

No, Phi Theta Kappa's legitimacy as an honor society is highly questionable due to their alleged deceptive practices and misleading claims.

These actions highlight a pattern of unethical behavior and deception that calls into question the legitimacy of PTK as an honor society. For students seeking genuine recognition and opportunities, it's crucial to be aware of these issues and consider alternatives that uphold higher ethical standards and transparency.

Is Phi Theta Kappa Respected?

Perceived Value by Employers: Employers who are familiar with PTK may recognize that its membership is not as exclusive or prestigious as advertised. This can lead to skepticism about the authenticity of the achievements listed on a resume, and PTK membership may not carry the weight or respect that other honors or accomplishments might.

Is Phi Theta Kappa a real honor society?

Deceptive Advertising: PTK's promotional materials often exaggerate the exclusivity and benefits of membership. They claim that being a member places you among an elite group, but the actual requirements for joining are relatively easy to meet. This discrepancy diminishes the true value and respect associated with PTK membership.

Can I Put Phi Theta Kappa on a Resume?

Misleading Scholarship Claims: PTK advertises access to exclusive scholarships as a significant benefit. However, many of these scholarships are available to all students, not just PTK members. Additionally, PTK often exaggerates the average scholarship amounts received by members, creating a false impression of financial benefits.

How Prestigious Is Phi Theta Kappa?

General Misrepresentation: PTK's portrayal of itself as a highly prestigious and selective honor society is misleading. The organization uses marketing strategies that exaggerate its exclusivity and the benefits of membership, leading many students to believe that membership is more prestigious than it truly is.

How does the lawsuit impact educational institutions?

How do the allegations against Phi Theta Kappa affect current and prospective students?

Educational institutions that may knowingly or unknowingly endorse or support PTK might need to reconsider their relationships with the society if the allegations are proven. Institutions should evaluate the claims and their own practices to ensure they are not inadvertently endorsing misleading information. This might involve reviewing their own promotional materials and communications about PTK to ensure they are accurate and transparent.

The allegations against Phi Theta Kappa (PTK) could have significant implications for current and prospective students. If the claims of deceptive advertising, false exclusivity, and misleading scholarship information are proven true, students may need to reassess the value and benefits of PTK membership. It's crucial for students to stay informed about the lawsuit's progress and its potential outcomes to make educated decisions about joining or remaining in the society.

Can I participate in any awareness campaigns about PTK's alleged deception?

Absolutely. Awareness campaigns are crucial for educating the public about the issues within Phi Theta Kappa. You can participate by sharing articles, graphics, and videos that highlight the lawsuit and the need for ethical reforms in PTK. Join online forums and groups dedicated to this cause, and consider organizing or attending events that focus on these issues.

How can I support the lawsuit against Phi Theta Kappa?

You can support the lawsuit against Phi Theta Kappa by staying informed and spreading awareness about the issues. Share information on social media, talk to fellow students, and participate in discussions about honor societies' transparency and ethics. You can also contribute to awareness campaigns that aim to support promote accountability in honor societies.

15. Defendants' publications also reuse the same "malicious" language comprising their "embezzlement" and misuse of "student dues" accusations. For example, in the article *Phi Theta Kappa Lawsuit: PTK Deceptive Practices and Attempted Monopoly*, Defendants state: "These deceptive tactics, the lawsuit claims, have enabled PTK to misappropriate significant funds from students exploiting their trust and aspirations."

16. The examples above are only a fraction of the misleading statements and wrongful characterizations of the lawsuit published on Honor Society's website alone.

17. Between June 19 and June 24, Defendants published approximately 5,000 online articles that include malicious, misleading content to bias students, colleges, and the general public against PTK. These articles appear to have been AI-generated and mass-produced with apocalyptic and horror movie-like representations of college campuses, PTK chapters, PTK members, and PTK donors – all to rebrand PTK as villains. Some examples of these images are produced below:



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Edmonds College, Lynnwood Campus: Alpha
Alpha Lambda Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Laramie County Community College, Cheyenne
Campus: Alpha Omega Zeta Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Sheridan College, Main Campus: Iota Theta
Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Western Wyoming Community College, Rock
Springs Campus: Sigma Xi Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at H. Lavity Stoutt Community College, Paraquita Bay Campus: Beta Omicron Sigma Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Northcentral Technical College, Wausau Campus: Beta Rho Zeta Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Northeast Wisconsin Technical College, Green Bay Campus: Beta Nu Theta Chapter of PTK



June 19, 2024 | By Honor Society Foundation | In

Phi Theta Kappa at Northwood Technical College, Rice Lake Campus: Beta Omega Delta Chapter of PTK



June 15, 2024 | By Honor Society Foundation | in
Phi Theta Kappa at Southwest Technical College, Fennimore Campus:
Beta Rho Beta Chapter of PTK



June 15, 2024 | By Honor Society Foundation | in
Phi Theta Kappa at UW-Green Bay, Manitowoc Campus: Alpha Sigma
Lambda Chapter of PTK



June 15, 2024 | By Honor Society Foundation | in
Phi Theta Kappa at UW-Green Bay, Sheboygan Campus: Alpha Mu
Omega Chapter of PTK



June 15, 2024 | By Honor Society Foundation | in
Phi Theta Kappa at UW-Milwaukee, Waukesha Campus: Alpha Chi
Rho Chapter of PTK

18. These articles include not only the language Defendants were enjoined from using in their March 2024 survey but also blatant falsities and language discouraging students and community colleges from continuing their relationships with PTK. For example, the articles discuss the “Allegations of False Advertising and Deceptive Practices,” which state:

PTK is accused of falsely advertising that its members are in the “Top 10%” of their class, along with promising substantial scholarship opportunities averaging \$2,500 per member annually. Investigations have revealed that many PTK members fall within the top 40-60% of their class, not the top 10%. Furthermore, the scholarships promoted by PTK are often not exclusive to its members.

19. Each article also subtly threatens the respective PTK chapter at issue using language like “Impact on Individual Chapters at Community Colleges,” “Potential Liability for Schools Hosting PTK Chapters,” and “Protecting Our Students.” Particularly with respect to “Potential Liability,” each article states:

Schools that host PTK chapters could face potential liability due to the known issues with false advertising. It is essential for [insert school name] to thoroughly review their association with PTK and ensure that their students are not misled by these practices. The institution has a responsibility to protect its students from any form of deceptive advertising.

20. Further, these AI articles are particularly deceptive because many are written in the voice of the colleges, implying that the colleges partnered with Honor Society or at least endorsed the articles published by Honor Society. For example, in an open letter to Northeast Wisconsin Technical College, Green Bay Campus Community, the letter begins:

Dear Northeast Wisconsin Technical College, Green Bay Campus Community,

We are reaching out to you with an urgent message regarding the honor society Phi Theta Kappa (PTK), which has a presence on this campus. Recent developments have brought to light shocking allegations against PTK that we believe every member of our community should be aware of.

The “letter” continues with:

A Call to Action

As a community, we must take a stand against these deceptive practices to protect our students and ensure their educational experience is not marred by misleading information. This is not just about one honor society; it is about safeguarding the integrity of our academic institutions and standing up for social justice.

We urge you to:

1. **Stay Informed:** Educate yourself about the allegations and understand their potential impact on our students.
2. **Speak Out:** Share this information with others and raise awareness about the issues surrounding PTK.
3. **Demand Accountability:** Call for greater transparency and accountability from PTK's leadership.

And concludes with:

Stand with us in this fight for justice and integrity.

—

This is a public service announcement in the interest of protecting students and community colleges. This website is not affiliated with Phi Theta Kappa.

The PTK CEO, Tincher-Ladner, allegedly masterminded these deceptive practices against community college students and institutions and should be held accountable. For more information about the PTK lawsuit, visit www.ptklawsuit.com. To post or follow the topic on social media, use #PTKlawsuit.

21. Given the use of “our academic institutions,” “our community” and “our students,” these articles imply at least some sort of endorsement by the colleges to publish such things. To my knowledge, no college has given such permission.

22. To my knowledge, Honor Society does not have members enrolled at every single school at which PTK has a chapter, making these articles deliberate attempts to not only interfere with PTK’s current contractual relationships but also potential ones.

23. The publications show Defendants’ clear intent to drive a wedge between PTK and its membership base and colleges. They falsely “alert” readers to “potential liability for schools

hosting PTK chapters.” They also repeatedly portray Defendants’ counterclaim allegations as facts, to deceive readers about PTK’s integrity and end with a misguided “Call for Action” to rally students, colleges, and other readers against PTK.. These are the same malicious misrepresentations Defendants levied in their March 2024 survey.

24. The articles also wrongfully attack, intimidate, and disparage me, saying I “allegedly masterminded these deceptive practices against community college students and institutions and should be held accountable.” Certain headlining images comprise AI generated images of caricatures of me while others are photoshopped:

LYNN TINCHER-LADNER: ALLEGED MISLEADING MASTERMIND



Phi Theta Kappa Sexual Harassment: Stunning Allegations Revisited



LinkedIn

Articles People Learning Jobs Groups



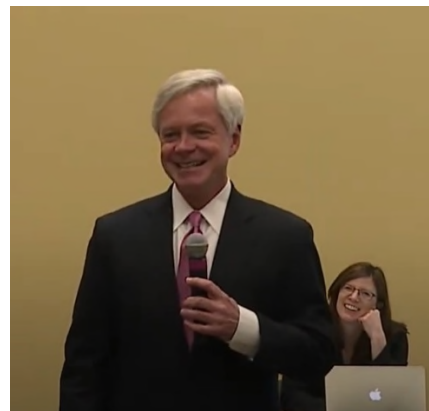
Time to unmask the truth at Phi Theta Kappa.

Phi Theta Kappa: Shocking Allegations & Unmasking the Truth.

Honor Society®
The Honor Society for All™
Published Jun 12, 2024

+ Follow

ROD RISLEY'S PTK CEO TENURE: SHADOWS OVER PHI THETA KAPPA



25. I believe the first two images to be AI generated as I conducted a reverse image search and was unable to find them online with the exception of Defendants' publications. Further, the combination of inconsistencies in the images (e.g., the hand not actually holding the money bag but appearing to be close) and the likely use of AI in connection with the articles themselves leads me to believe these images to be created using AI.

26. However, the photoshopped images including the former PTK CEO and myself in particular cause me great distress, as they imply a close relationship with PTK's former executive director and my endorsement of him. Neither are true. I can confirm that neither picture shown above was ever taken and that neither of these images exist outside of Defendants' own articles.

27. Although Defendants have edited the images and content of several (but not all) the articles, the content and images appear to be cached and come up during online searches.

28. Defendants have also recycled these misleading statements and mischaracterizations in at least 13 "news" articles, reframing this lawsuit as one they initiated, suing PTK for deceptive practices and monopolization. Below are exemplary statements from the articles, characterizing the lawsuit to Defendants' benefit, are provided below:

PTK "mislead[s] [students] about the exclusivity of the honor society," sends "questionable letters of recommendation . . . deceiv[ing] students, colleges, and employers about the merit of PTK membership," "misrepresent[s]" scholarship opportunities leading "students to pay for PTK membership under false pretenses," uses "aggressive and deceptive practices," and "falsely claim[s] to be the 'only official' honor society."

- "If these allegations are true, PTK's practices could have misled many students, causing them to join the honor society based on false information about its exclusivity and scholarship benefits. This not only impacts their financial decisions but also their academic and professional opportunities."
- "Educational institutions that partner with PTK might need to reassess their affiliations and ensure they are not inadvertently supporting misleading practices. This lawsuit encourages colleges to scrutinize Phi Theta Kappa and verify the claims they make to students."

- “These allegations, if proven true, suggest that PTK’s practices could have misled many students and educational institutions. The deceptive claims about membership exclusivity and scholarships may have influenced students’ decisions, potentially leading them to invest time and money based on false information.”
- “While Phi Theta Kappa markets itself as a prestigious honor society, the reality is quite different. The claims of exclusivity and significant scholarship opportunities are often overstated and misleading. Student should critically evaluate the actual benefits and consider whether the cost and ethical concerns outweigh the potential advantages.”

“These deceptive tactics, the lawsuit claims, have enable PTK to misappropriate significant funds from students exploiting their trust and aspirations.”

- Lynn Tincher-Ladner’s tenure as CEO of Phi Theta Kappa has been marked by serious allegations of misleading practices and monopolistic behavior. These issues raise significant concerns about the integrity and trustworthiness of PTK. As the educational community watches closely, it remains to be seen how PTK will address these allegations and what steps will be taken to restore its reputation.”

29. Defendants have posted the articles containing the incendiary language not only on Honor Society’s website but also on the HS Foundation website, each of which contain misleading statements and editorialize the lawsuit:

- *Phi Theta Kappa Lawsuit: PTK Deceptive Practices and Attempted Monopoly;*
- *Lynn Tincher-Ladner: Alleged Misleading Mastermind;*
- *Is Phi Theta Kappa a Big Deal? No, It’s Not.;* and
- *Is Phi Theta Kappa Worth It?*
- *Phi Theta Kappa Sexual Harassment: Stunning Allegations Revisited*
- *Phi Theta Kappa Embezzlement: A Deep Dive into the Allegations*
- *Phi Theta Kappa Employee Reviews: Unmasking the PTK Workplace Environment*
- *Phi Theta Kappa Reviews: Real Student Experiences*
- *Is Phi Theta Kappa Ethical?*

30. For example, in the article *Phi Theta Kappa Embezzlement: A Deep Dive into the Allegations*, Defendants state “Alongside the embezzlement charges, PTK has faced criticism for its deceptive advertising practices. These include misleading claims about membership benefits and the exclusivity of the honor society.” The article also includes the following image, which now consistently appears in connection with searches about PTK:



31. Each of the above articles as seen on the HS Foundation website is tagged not only as “PTK Lawsuit” but also as “abuse” and are accompanied by images that appear to have been created by Defendants using an AI generator as noted above. Other images include those of women, who appear to resemble me as a masked and/or money-grabbing villain, as well as images conveying derogatory Asian sentiments, all to discourage PTK membership:

LYNN TINCHER-LADNER: ALLEGED MISLEADING MASTERMIND



LinkedIn

Articles People Learning Jobs Games



Time to unmask the truth at Phi Theta Kappa.

Phi Theta Kappa: Shocking Allegations & Unmasking the Truth.



Honor Society®
The Honor Society for All.™
Published Jun 12, 2024

+ Follow

IS PHI THETA KAPPA WORTH IT?



IS PHI THETA KAPPA A BIG DEAL? NO, IT'S NOT.




32. Honor Society advertises that its website is so highly trafficked that Honor Society is the largest academic and professional society in the nation by web traffic. That website traffic, combined with Defendants nearly 30,000 followers across its Twitter and LinkedIn accounts, ensure that Defendants' spread of misinformation is reaching a massive number of people, including those affiliated with or interest in PTK, which also has a large membership base of approximately 4.2 million people due to PTK's lifetime membership.

33. Moreover, either by design or by the sheer multitude of Defendants' publications, Defendants' articles now appear higher than those of PTK when PTK is searched in connection with one of its collegiate partners. On July 2, I navigated to Google.com and searched "Phi Theta Kappa Hinds Utica Campus." Defendants websites comprise the fourth and sixth results on the first page, even above any of PTK's links:

Google


Phi Theta Kappa Hinds Utica Campus

All Images Videos News Forums Shopping Web More Tools

 Hinds Community College
https://www.hindscc.edu › Honors Institute

Phi Theta Kappa

Membership in **Phi Theta Kappa** is the best deal around when it comes to earning scholarship dollars in higher education.

 Hinds Community College
https://www.hindscc.edu › ... › Clubs & Organizations


Phi Theta Kappa Chapters

Each **Hinds CC campus**/location has a **Phi Theta Kappa** chapter and an advisor. Contact the Honors **Institute** (601-857-3837) or the chapter advisor on your **campus** ...

People also ask :


- How hard is it to get into Phi Theta Kappa?
- What is the acceptance rate for Phi Theta Kappa?
- What happens if your GPA drops in Phi Theta Kappa?
- What famous people went to Phi Theta Kappa?

Feedback

 Hinds Community College
https://www.hindscc.edu › _trashed-2


Hinds CC Utica Campus inducts new Phi Theta Kappa ...

Nov 29, 2023 — The Alpha Beta Xi Chapter of the **Phi Theta Kappa** Honor Society on the **Hinds Community College Utica Campus** selected new officers for the 2023-24 ...

 Honor Society Museum
https://honorsocietymuseum.org › ptk-hinds-communit...


Alpha Beta Xi Chapter at Hinds Community College, Utica ...

Jun 12, 2024 — We are reaching out to alert you to some serious concerns involving **Phi Theta Kappa (PTK)**, an honor society across many **community colleges**. A ...

 Hinds Community College
https://foundation.hindscc.edu › ... › Alumni Chapters

Honors/PTK - Hinds CC Foundation & Alumni

This chapter is open to all **Phi Theta Kappa** and Honors Alumni. ... **Hinds Community College** is an Equal Opportunity Employer. Updated by **Hinds** ...

 Honor Society Foundation
https://honorsocietyfoundation.org › phi-theta-kappa-hi...

Phi Theta Kappa at Hinds Community College, Utica Campus



Phi Theta Kappa, self-proclaimed as the world's largest honor society for **community college** students, is accused of engaging in widespread false advertising.

34. Similarly, when I searched “phi theta kappa southwest mississippi community college,” Defendants’ websites were the third, fourth, and fifth results on the first page, above those of PTK:



Google

phi theta kappa southwest mississippi community college


All Images News Videos Forums Shopping Web More


 Southwest Mississippi Community College
<https://www.smcc.edu> > current-students > student-orga... 


Student Organizations - Southwest Mississippi Community ...
 Phi Theta Kappa was established in 1918 to recognize the outstanding scholastic achievement of community college students. There are over 800 chapters in the ...


 Facebook · Southwest Mississippi Community College Phi Theta Kappa
 890+ followers 


Southwest Mississippi Community College Phi Theta Kappa
 Southwest Mississippi Community College Phi Theta Kappa, Summit, Mississippi. 690 likes · 15 talking about this. PTK is an international academic honor...

People also ask 



Does Phi Theta Kappa look good on a college application? 

How prestigious is Phi Theta Kappa? 



How selective is Phi Theta Kappa? 

Is Phi Theta Kappa recognized? 



Feedback

 HonorSociety.com
<https://honorsociety.com> > phi-theta-kappa-southwest-... 

Phi Theta Kappa Warning! Caution at Southwest ...
 Jun 16, 2024 — Phi Theta Kappa (PTK), self-proclaimed as the world's largest honor society for community college students, has recently come under scrutiny for ...

 Honor Society Foundation
<https://honorsocietyfoundation.org> > phi-theta-kappa-so... 

Phi Theta Kappa at Southwest Mississippi Community ...
 Phi Theta Kappa (PTK), often hailed as the world's largest honor society for community college students, is currently embroiled in a significant lawsuit over ...

 Honor Society Foundation
<https://honorsocietyfoundation.org> > ptk-southwest-mis... 

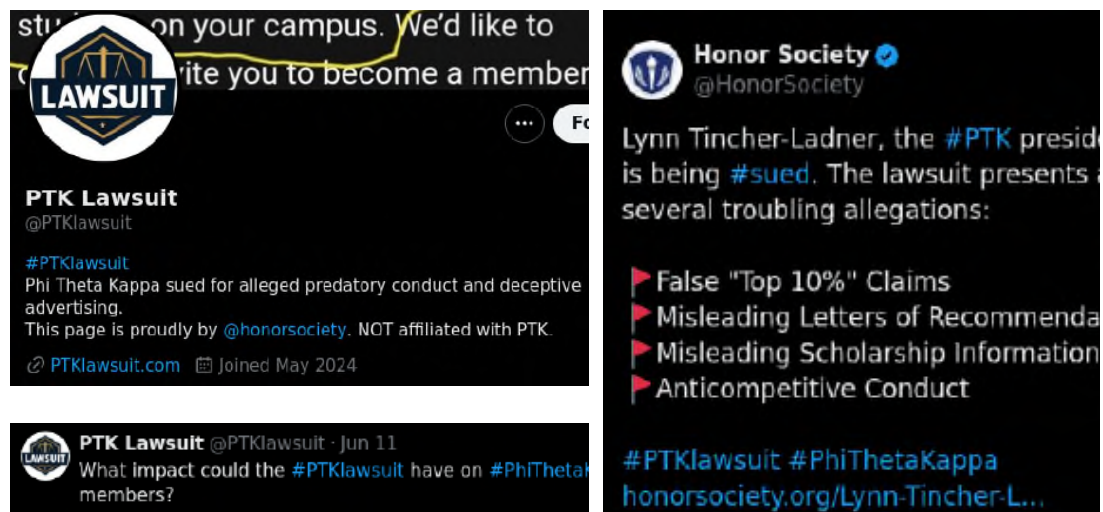
Phi Theta Kappa Alert at Southwest Mississippi Community ...
 May 17, 2024 — Phi Theta Kappa (PTK) is self-proclaimed as the world's largest honor society for community college students. However, recent allegations of ...

35. In today's day and age, it is extremely common for students and parents, to want to conduct an independent search of what organizations are available on campus. To see that one of

the first results is a warning page about PTK acts as nothing less than a deterrent. Likewise, sponsors and donors research PTK in connection with its collegiate partners would find similar results, leading to their skepticism in PTK and withholding (or removal) of any endorsement of PTK.

Statements on their Twitter (or X) account, @PTKLawsuit

36. Defendants' campaign includes a Twitter (or X) account named **@PTKLawsuit** which is dedicated solely to editorializing the lawsuit to Defendants' benefit. Images of the account are shown below:



37. Defendants' Twitter account repeatedly encourages and directs viewers back to PTKlawsuit.com, which is Defendants' website with the disparaging statements listed above.

38. In addition, Honor Society's and Honor Society Foundation's Twitter (or X) accounts have similarly been posting misleading and disparaging statements about PTK and myself, while directing their 15.5 thousand and 1.4 thousand followers respectively, to Defendants' articles and www.PTKlawsuit.com.

39. To further maximize their audience and attempt to gain traffic through their #PTKLawsuit, Defendants have also re-posted these Tweets to their affiliated CampusBuddy Twitter account, which has been revived for the first time in nearly a decade.

Defendants Employ News Sources to Taint the Jury Pool

40. Mississippians tend to recognize and take interest in PTK and other honor societies, since community colleges and the honor society chapters that support them are an integral part of the Mississippi higher education system. In Mississippi, this lawsuit is squarely in the public eye, and has been since its inception. For example, Bloomberg published an article at the inception of the action titled, “Phi Theta Kappa Honor Society Sues to Enforce Trade Dress” and more recently published an update titled “Phi Theta Kappa Trademark Suit Greenlit Against HonorSociety.org.”

41. Moreover, multiple news media outlets, including in Jackson, Mississippi, have published articles including content extremely similar to that of Defendants’ own publications. Examples of these publications include:

- College Budget: Article and Reviews for Students, ran an article titled “Lynn Tincher-Ladner & Phi Theta Kappa Are Sued for False Advertising: What You Need to Know.” Similarly, the article quotes from Defendants’ own publications and directs the reader to www.ptklawsuit.com.
- The Jackson Jambalaya: An online news source in Jackson, Mississippi, published an article titled “Food Fight: Ivory Tower Edition” which quotes verbatim Defendants’ publications regarding the lawsuit and points the reader to back to www.ptklawsuit.com.

42. Recently I learned that Defendants have been printing out their publications and mailing them directly to PTK-partner colleges. Therefore, I have reason to believe that Defendants have also been sending their misleading articles directly to third-party news sources in an attempt to disseminate their misinformation as much as possible.

Caricaturization of Myself, the President and CEO of Phi Theta Kappa Honor Society

43. My name, Lynn Tincher-Ladner, and PTK are called out specifically in Defendants' websites, publications, Twitter accounts, and LinkedIn accounts which include disparaging and misleading statements. In addition, Honor Society resorts to prejudicial tactics by caricaturizing myself in its publications as a masked, money-grabbing "mastermind." The examples of which are shown above.

44. Honor Society leaves nothing to the reader's imagination through the nature of the female caricatures, overlaying my name directly on top of this caricature, and in the misleading and prejudicial publication titles. Honor Society's campaign to disparage PTK and my reputation and taint the jury pool, including my credibility, knows no bounds.

45. The publications and the caricaturizing of my likeness is detrimental to PTK's and my reputation, ability to receive a fair trial, and my effectiveness as a testifying witness before a jury.

46. These caricatures portray me as what I can only see to be a villain. One image (as shown above) displays a woman who resembles me in looks and wearing gold regalia with a sinister smile all while holding a bag of money. Students, sponsors, and donors who see this image in connection with my name can only think of one thing in connection with me – dishonesty. Likewise, the photoshopped images I noted above imply my endorsement or affiliation with my predecessor, which given some of the allegations Honor Society has made in this suit (i.e., sexual harassment and embezzlement), are meant to tie me to gross allegations of misconduct.

Nature and Effect of Publishing Misleading Statements

47. PTK's college partners are important to its business. Prospective PTK members are invited to join in one of two ways: 1) invitations are directly issued from the college to eligible students; or 2) in cases where the schools ask for assistance with invitations, PTK emails

invitations to students directly. Prospective students join PTK because PTK recognizes students for their academic achievement, provide scholarships and programs to promote job readiness and transfer-readiness to four-year colleges and universities, in exchange for a one-time fee. Information about PTK membership is publicly available online, *e.g.*, at www.ptk.org/join/faqs/. Information about PTK's membership program and the involvement of its college partners is generally known in the industry, including by its competitors.

48. Without the support and confidence of its college partners, PTK would lose out on a substantial number of new members, and existing members would be less likely to attend paid PTK member events, such as the PTK annual meeting (*i.e.*, PTK Catalyst). Further, without PTK's collegiate partners, PTK would be unlikely to receive the sponsorships, grants and endowments it currently receives to support PTK member resources and cover PTK dues for students unable to afford them.

49. As shown above, Defendants' publication and contribution to over 5000 articles, extremely active Twitter account dedicated to reframing the lawsuit (*e.g.*, #PTKLawsuit), and website with over forty pages of disparaging PTK and lawsuit-related commentary – all for the purpose of harming PTK's reputation among members, prospective members, and college partners and tainting the jury pool – are all inaccurate and misleading. These widespread and near-continuous publications are tremendously prejudicial and cause irreparable harm.

50. Misleading assumptions questioned in the websites are also false or misleading. For example, PTK represents—and it is wholly true that—\$2,500 is an average of all transfer scholarship offerings, of which there are more than 850. *See, e.g.*, PTK's Scholarship Map at: www.google.com/maps/d/viewer?mid=1fatZ5qi1nbPvIxEUDBGXDmKy5wTA5EY&femb=1. While not every PTK member receives that amount, that is why it is described as an “average.”

Similarly, it is wholly true that PTK is the “official” honor society for community colleges in the United States. PTK was given that recognition in 1929 by the American Association of Junior Colleges (known today as the American Association of Community Colleges) – a recognition that has never been withdrawn and instead validated by all member community colleges. Further, because of PTK’s relationship with community colleges developed over the last 100 years, PTK is often referred to by those schools as their “official” honor society, since those schools give PTK the names and contact information of those students who earned the right to join PTK. In many instances, PTK is the only “general” (as opposed to program specific) honor society at the school. So this suggestion in Honor Society’s website and publications that there is falsity to PTK’s claim to be the “official” honor society to community colleges is itself false and misleading. These are also facts that I confirmed in my deposition to Honor Society’s counsel in response to direct questioning about both the \$2,500 amount regarding transfer scholarships and PTK as the “official” honor society to community colleges.

51. Defendants’ websites, publications, posts on social media (Twitter and LinkedIn), and Twitter (or X) account were undoubtedly created and disseminated for the purpose of harming PTK and me, and has succeeded.

52. Since March 28, 2024, and coinciding with Defendants’ malicious smear campaign, PTK has received an unprecedented number of requests for membership cancellations from both current members and alumni. For example, PTK has received over 20 student membership cancellation requests, despite the fact that PTK membership is free for life following the initiation fee:

PTK0136664	<div> <div></div> <div>March 2, 2024 at 11:00 PM</div> </div> <p>Hi, I hope this email finds you well. I am currently a PTK alumni member however, I would like to reach out to ask how I would go about canceling membership with the organization, if decided. Please let me know when you have a chance.</p>
PTK0136665	<div> <div></div> <div>March 28, 2024 at 2:04 PM</div> </div> <p>Hello, I would like to cancel my membership with PTK! Thank you.</p>

PTK0136666	<p>██████████ March 22, 2024 at 12:08 PM</p> <p>To whom it may concern:</p> <p>Hello, my name is Nina Naomi Bimecham Abunui (ID: #000021171328). I was writing in to get my account permanently deleted. I've trying doing so on my own, but I realized that I had to sent an email to make that request. Let me know if you need any other information from me to complete that progress.</p>
PTK0136667	<p>██████████ April 5, 2024 at 7:58 AM</p> <p>Hi. I would like to request to have my PTK membership permanently terminated/removed from all aspects and affiliations entirely from the database no questions asked. I want my request to be served with upmost respect in my decision.</p> <p>Please email me back as confirmation/verification that this has been successfully completed.</p> <p>Thanks.</p>
PTK0136668	<p>██████████ April 12, 2024 at 12:47 PM</p> <p>Good afternoon,</p> <p>I need help to cancel this membership I have tried to do so online. Please cancel my membership and remove my name from the organization list today. Meicha Geohagen-Moguche</p> <p>Member # 2144438 April 22,2009</p> <p>Please confirm receipt of cancellation thank you.</p>
PTK0136669	<p>██████████ April 13, 2024 at 11:45 PM</p> <p>Hello, I joined Phi Theta Kappa in October of 2020. My member ID # is 000021308087. I am submitting this request because would like to be removed from the society. I no longer wish to be apart of the organization and am trying to find out who do I need to speak to that can help me with this?</p>
PTK0136670	<p>██████████ April 17, 2024 at 10:47 AM</p> <p>I am only able to find information about advisors revoking membership but nothing about self voluntary removal. I would not like to be associated with PTK anymore. What are the steps to follow to ensure that this happens?</p>
PTK0136671	<p>██████████ May 6, 2024 at 1:30 PM</p> <p>Hello,</p> <p>My name at the time of enrollment was Jatna Suazo. I attended Hudson County Community College during the years of 2012-2014. My address at the time was 189 Pine Street apt #3 Jersey City New Jersey.</p> <p>My reason for cancelling my membership is because I no longer want to be a part of the organization.</p>
PTK0136672	<p>██████████ May 13, 2024 at 10:01 PM</p> <p>Yes i would like you to cancel my membership.</p>
PTK0136674	<p>██████████ May 15, 2024 at 5:51 PM</p> <p>I would like to officially cancel my PTK membership.</p>
PTK0136675	<p>██████████ May 21, 2024 at 2:28 PM</p> <p>Hello,</p> <p>I would like to revoke my membership. ID is 000020512959.</p>
PTK0136676	<p>██████████ May 21, 2024 at 7:46 PM</p> <p>Hi,</p> <p>I would like to terminate my membership with PTK. If you could guide me in the right direction, that would be great. My name is Shaundrel Smith and I joined around 2017 at West Georgia Technical College.</p>
PTK0136677	<p>██████████ May 25, 2024 at 6:01 PM</p> <p>Cancel membership and remove my name and personal information disclosed from platform worldwide.</p>
PTK0143226	<p>██████████ June 5, 2024 at 1:33 PM</p> <p>Hello, I just wanted to delete/ deactivate my membership indefinitely.</p> <p>Thank you!</p>
PTK0143228	<p>██████████ June 6, 2024 at 2:20 PM</p> <p>Hello, I would like to cancel my membership of being a PTK member. I was unable to do it myself so I'm not sure what to do next.</p>
PTK0143227	<p>██████████ June 7, 2024 at 2:17 PM</p> <p>Hello, I wish for a way to cancel my membership despite it being lifetime. I no longer want to be a part of PHI THETA kappa anymore.</p>
REV_00064787	<p>██████████ March 19, 2024 at 5:04 AM</p> <p>Hi my name is Danielle DeWitt and I would like to cancel my membership. Please let me know what all you need from me so I can make this happen.</p>

REV_00064789	<div> <div></div> <div>April 23, 2024 at 3:15 PM</div> </div> <p>Hello,</p> <p>I am reaching out to delete my account. Please let me know what the process entails and if you need any additional information from me.</p>
REV_00064790	<div> <div></div> <div>May 10, 2024 at 8:51 AM</div> </div> <p>Hello,</p> <p>My name is Tyrani Key and I would like to cancel my membership with PTK.</p>

53. I have no recollection of anything like this happening before in such magnitude, but PTK expects that given Defendants' campaign to ruin PTK and its reputation, these cancellations will increase in number and rate. PTK expects that the recent terminations represent only a fraction of the 2025 prospective members, who will choose to turn their backs on PTK in enrollment season as a result of Defendants' smear campaign.

54. In addition, PTK has experienced a decline in membership revenue between March 1, 2024 and June 30, 2024. Compared to that same time period in 2023, PTK has lost \$81,595 in membership revenue.

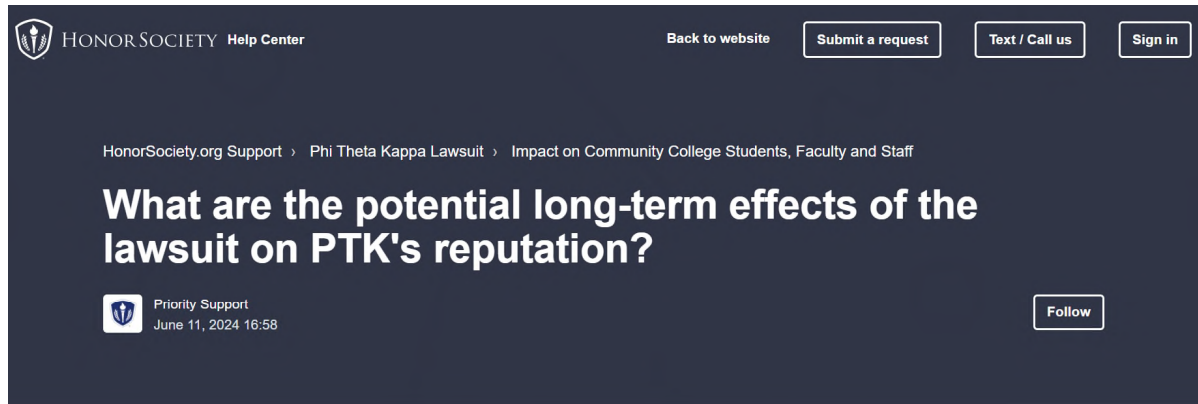
55. PTK has also experienced an unprecedented number of college and corporate partners declining to renew their contracts with PTK Connect. Approximately 15% of PTK's partners have already declined to renew their PTK Connect membership.

56. In addition, PTK's online store has already experienced a sharp decline in sales. PTK uses its webstore to sell items such as PTK-branded regalia, apparel, jewelry, and other accessories, which are down over \$100,000 from March-June of 2024 compared to the same time period last year.

57. Further, PTK's public reputation is also in decline. It is my understanding that Defendants continue to distribute the March 2024 survey (sans the enjoined questions), but the survey now contains a link to an unclaimed Trustpilot page, which I understand to be a third-party ratings website. It appears that visitors from the March 2024 survey, and in connection with

Defendants' malicious publicity campaign, have led to numerous individuals publishing negative reviews about PTK.

58. The reputations of both PTK and myself have been damaged substantially, which Defendants perceived as a success. Defendants have already admitted that their intention is to destroy PTK's reputation:



The long-term effects of the lawsuit on PTK's reputation could be significant, especially if the allegations are substantiated. PTK might face a loss of trust and credibility among students, educational institutions, and the broader community. Restoring its reputation would require substantial efforts to improve transparency, accountability, and the accuracy of its claims. This could lead to systemic changes within the organization to rebuild trust.


Hi. Need any help?

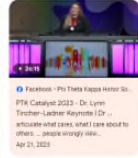
As to myself, Defendants clearly intend to harm my reputation based on the malicious articles published specifically about me. Much like PTK, when my name is now searched online, Defendants' malicious articles about me appear on the first page of results:

Google lynn tincher-ladner

All News Images Videos Shopping Forums Web More Tools

Lynn Tincher-ladner






Phi Theta Kappa
President & CEO
Lynn Tincher-Ladner spends her time connecting many of the nation's hardest-working college students to life-changing scholarships and family-sustaining ...

LinkedIn · Lynn Tincher-Ladner
Lynn Tincher-Ladner - President and CEO - Phi Theta Kappa
Greater Jackson Area · President and CEO at Phi Theta Kappa · Experience: Phi Theta Kappa · Education: Mississippi State University · Location: Greater Jackson Area · 500+ ...

Bureau of Educational and Cultural Affairs (gov)
Dr. Lynn Tincher-Ladner

Instagram · dr_lynn_ptk
Lynn Tincher-Ladner (@dr_lynn_ptk)
205k Followers, 1922 Following, 320 Posts · Lynn Tincher-Ladner (@dr_lynn_ptk) on Instagram: "Making the bright shine brighter. #amptk"

People also ask

Who is the CEO of Phi Theta Kappa?

X · TincherLadner
Lynn Tincher-Ladner (@TincherLadner) ...
Making the bright shine brighter—President and CEO of Phi Theta Kappa. @phithetkappa #CComart

LinkedIn · Honor Society
Lawsuit Filed Against Phi Theta Kappa CEO Lynn Tincher ...
In a groundbreaking defense of students and community colleges alive, Honor Society has filed a federal lawsuit against Lynn Tincher-Ladner, ...

Forbes
Dr. Lynn Tincher-Ladner BrandVoice
Dr. Lynn Tincher-Ladner is President and CEO of Phi Theta Kappa Honor Society, the nation's oldest ... Read More · SOCIAL, latest popular archive

Videos

PTK Catalyst 2023 - Dr. Lynn Tincher-Ladner Keynote | Dr ...
Facebook · Phi Theta Kappa Honor Society · Apr 21, 2023

Dr. Lynn Tincher-Ladner Keynote- PTK Catalyst 2024
YouTube · PTK TV · Apr 16, 2024

3 key moments in this video

Instagram video by Lynn Tincher-Ladner · Mar 31, 2024 at 7 ...
Instagram · dr_lynn_ptk · Mar 31, 2024

Phi Theta Kappa
Tincher-Ladner to serve on J. William Fulbright Foreign ...
Mar 8, 2024 — Lynn Tincher-Ladner to serve as a member on the J. William Fulbright Foreign Scholarship Board. The 12-member board appointed by the ...

X · TincherLadner
Lynn Tincher-Ladner on X: "Welcome new leaders!" / X
Welcome new leaders! Quote

Honor Society
Lynn Tincher-Ladner Lawsuit
In defense and protection of community college students nationwide, Honor Society has filed a federal lawsuit against Lynn Tincher-Ladner, CEO of Phi Theta ...

Articles

Community College Times
Black History Month: A time for reflection, assessment
By Lynn Tincher-Ladner
When I was younger, Black History Month meant reading the biographies of famous African Americans and...
Feb 10, 2023

Community College Times
Student perspectives: Retaining dual-enrolled students
By Lynn Tincher-Ladner
One of the most important outcomes of attending the American Association of Community Colleges (AACCC...
Jan 2, 2023

The Chronicle
Phi Theta Kappa to Mississippi Gov. Tate Reeves: Change the stat...
By Lynn Tincher-Ladner
Phi Theta Kappa is headquartered in Mississippi and has an economic impact of over \$5.5 million annually...
Jun 12, 2020

Googooooooooooooole

1 2 3 4 5 6 7 8 9 10 Next

● Downtown, Columbus, OH · From your IP address · Update location

59. Given the sheer number and nature of the articles referencing me, I will need to hire experts to help repair my damaged reputation and search engine results to protect me and the PTK brand. In fact, I have already received unsolicited messages from crisis reputation management firms to help rehabilitate my personal image. Based on these solicitations and my personal experience using Search Engine Optimization (“SEO”) in other matters, I believe I will need to engage in a three-month SEO campaign to rehabilitate my online reputation. I estimate that it will cost approximately \$10,500 of my own personal money to do so. Efforts for PTK will likely take more time and be even more costly.

60. Defendants’ coordinated attacks have clearly threatened PTK’s collegiate partners and members from continuing their relationships with PTK and put each PTK prospective member at extremely high risk of missing her window to join PTK and take advantage of PTK membership benefits. In spreading misinformation, which may have led to the flagging of PTK as a phishing scheme, or encouraging students to ignore their PTK invitations, Defendants are potentially depriving community college students of thousands of dollars in scholarships without recourse.

61. Another consequence of the conduct described above is that it has diverted the focus of me, my staff and the colleges we serve off of the student members of PTK. The conduct and resulting problems have disrupted and degraded the PTK member experience and interfered with PTK’s ability to do its daily work.

62. PTK has never attempted to litigate this case in the court of public opinion. While it is true that PTK issued a press release on the filing of the suit, it was singular and was transmitted through the typical course of such press releases (i.e., at the time the Complaint was filed on April 21, 2022). What Honor Society is doing here is far more pernicious and widespread, activating the internet and social media in a campaign to destroy the reputation that PTK has spent the last 100

years building. PTK's summer invitation season has just begun, and PTK is actively recruiting 120,849 students for membership. Based on last year's recruitment numbers, PTK expects to target approximately 460,000 students in the fall for membership, which includes those being targeted in the current campaign, as students typically do not accept their membership invitations in the summer. Absent relief from this Court, the effects of Honor Society's deceptive and misleading internet and social media campaign will be devastating to PTK.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 14, 2024.

A handwritten signature in black ink, appearing to read "Lynn Tincher-Ladner", written over a horizontal line.

Lynn Tincher-Ladner, Ph.D.